

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:) Chapter 7
)
JC USA, Inc., <i>et al.</i> , ¹) Case No. 23-10585 (JKS)
)
Debtors.) (Jointly Administered)
)
) Obj. Deadline: May 6, 2024 at 4:00 p.m. (ET)
) Hearing Date: May 14, 2024 at 1:00 p.m. (ET)

**NOTICE OF MOTION OF DON A. BESKRONE, CHAPTER 7 TRUSTEE,
PURSUANT TO 11 U.S.C. §§ 105(a) AND 363(b), FED. R. BANKR. P. 6004,
AND LOCAL RULE 6004-1, FOR AN ORDER AUTHORIZING THE PRIVATE SALE
OF CERTAIN VISA/MASTERCARD LITIGATION CLAIMS**

PLEASE TAKE NOTICE that on April 22, 2024, Don A. Beskrone, in his capacity as the duly appointed Chapter 7 trustee (the “Trustee”) in the above-captioned cases and for the above-referenced debtors (collectively, the “Debtors”), by and through his undersigned counsel, Ashby & Geddes, P.A, filed the *Motion of Don A. Beskrone, Chapter 7 Trustee, Pursuant to 11 U.S.C. §§ 105(a) and 363(b), Fed. R. Bankr. P. 6004 and Local Rule 6004-1, For An Order Authorizing the Private Sale of Certain Visa/Mastercard Litigation Claims* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief sought in the Motion must be (a) in writing and served on or before **May 6, 2024 at 4:00 p.m. (ET)** (the “Objection Deadline”); (b) filed with the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 3rd Floor, Wilmington, DE 19801; and (c) served as to be received on or before the Objection Deadline by the undersigned counsel.

PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE MOTION WILL BE HELD ON **MAY 14, 2024 AT 1:00 P.M. (ET) BEFORE THE HONORABLE J. KATE STICKLES, UNITED STATES BANKRUPTCY JUDGE FOR THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 5TH FLOOR, COURTROOM #6, WILMINGTON, DE 19801.**

¹ The Debtors in these cases, along with the last four digits of their federal tax identification numbers, are: JC USA, Inc. (0028), JC Franchising, Inc. (7656), New JC Holdings, Inc. (1506), JC Acquisition, Inc. (2395), JC Inter. Holdings, Inc. (3621) and JC Hold, LLC (4170).

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: April 22, 2024

ASHBY & GEDDES, P.A.

/s/ Ricardo Palacio

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